

# EXHIBIT 49

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:  
  
THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO  
  
as representative of  
  
THE COMMONWEALTH OF PUERTO RICO, et  
al.,  
  
Debtors. <sup>1</sup>

PROMESA  
Title III

No.17 BK 3283-LTS

(Jointly Administered)

This filing relates to the  
Commonwealth, ERS, HTA,  
and PBA.

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U.S. DISTRICT COURT  
SAN JUAN, P.R.

REPLY TO

FOUR HUNDRED SIXTY-FIFTH OMNIBUS OBJECTION (SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO, THE EMPLOYEE'S RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO, THE PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY, AND THE PUERTO RICO PUBLIC BUILDINGS AUTHORITY TO CLAIMS FOR WHICH THE DEBTORS AND NOT LIABLE. (DOCKET NO. 20796)

NOW APPEARS **MIRIAM SANCHEZ LEBRON** representing herself (pro se), and hereby roundly objects the decision taken by The Financial Oversight and Management Board for Puerto Rico as representative of The Commonwealth of Puerto Rico, jointly administered with PBA.

Due to a deed number twenty (20) of Participation and Adjudication of Hereditary Assets, at the name of Juana Lebron Perez, dated August 1<sup>st</sup>, 1955, executed before Notary Aguedo Mojica Marrero. Where three (3) resolutions and a bonus payment was received for service render from the Department of Veteran Affairs are mentioned too that should have been in file **CS 55-413** of which only the one resolution from June 24, 1955, appeared.

To my best understanding, the **Court of General Justice of Puerto Rico** is one of the most important dependencies of the Commonwealth of Puerto Rico and **responsible** for all these documents and payments under his custody and the employees' fraud actions. Well, in the **Judicial Branch** they had been **denied us** hidden these two resolutions dated **April 29 and July 10, 1955, for two decades**, they had been switched the two resolutions from files **CS-55-413** to **CS-55-732** to avoid us to find it. They also had discriminated, violate ours civil and constitutional rights and some others several violations. Just because of the **fraud conspiracy scheme with a third party to illegally take possession of all the heredity assets** that belong to my mother **Juana Lebron Perez** after my grandfather **Eladio Lebron** died. I have a question **Why the Court of General Justice of Puerto Rico still hiding my mother heredity assets?** The fact is related to the outcome is that if we find this evidence our family will have a **solid base** to establish that we are the real legal owners of some of the properties the **commonwealth** and the **Puerto Rico Public Buildings Authority** have right now. Our claim is not **craving** is real. When the Judicial Branch of Puerto Rico take these two resolutions out, my claim will be clear. How a citizen of Puerto Rico can believe in the Court of General Department with this fact. (For all of this explanation, I have substantial evidences).

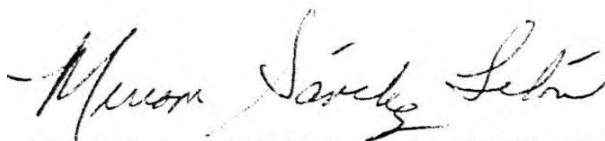
We very respectfully request The Financial Oversight and Management Board for Puerto Rico **to request** the Judicial Branch of Puerto Rico the **two resolutions** dated **April 29 and July 10, 1955**, in file **CS-55-413 OR CS-55 732** to establish that our claims are fair and truthful and to make **justice** with this case and. to clear up this fraud to avoid the Commonwealth of Puerto Rico, The Judicial Branch and Third Party keep violate our civil and constitutional rights.

For all these reasons I very respectfully request this Honorable Court that accept our objection to the decision take by The Financial Oversight and Management Board for Puerto Rico and to reconsiders its decision. And also to grant my petition to Oversight Board, to request the two resolutions hidden by the Inactive Documents Program at the Judicial Branch.

Pc: Copy of Deed 20 and the only resolutions that appears dated June 24, 1955, on file **CS-55-413**.

Respectfully submitted:

Date May 27, 2022



Miriam Sánchez Lebrón (Claim Numbers **(17230 and 173831)**)  
HC-04 BOX 4001  
HUMACAO, PUERTO RICO 00791-8900

Copy to: Counsel for the Oversight Board

Proskauer Rose LLP  
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New York, New York 10036-8299  
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Brian S. Rosen

Counsel for the Creditors' Committee  
Paul Hastings LLP  
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Attn: Luc A. Despins  
James Bliss  
James Worthington  
G. Alexander Bongartz

EXHIBIT NUMBER 4

OPTIMUS OPTABILIOUS

Aguedo Mojica Marrero

ATTORNEY - NOTARY  
NOYA Y HERNÁNDEZ No. 54, ALTOS  
HUMACAO, PUERTO RICO

[Seal of Puerto Rico]

Deed No. TWENTY

REGARDING  
PARTITION AND ADJUDICATION OF ESTATE

Entered by Saturnina Ortiz, Widow of Lebrón, William

Lebrón Colón, and Juana Lebrón Pérez

[handwritten:] sole owner

August 1<sup>st</sup> 1955



NUMBER TWENTY

ESTATE PARTITION AND ADJUDICATION DEED

On the first of August, nineteen hundred and fifty-five, in Humacao, Puerto Rico, the following persons appeared before me, AGUEDO MOJICA MARRERO, civil-law notary on the Island of Puerto Rico, domiciled, resident and with offices at number fifty-four calle Noya & Hernandez, Humacao, Puerto Rico, and the witnesses who are listed at the end of this document:

MRS. SATURNINA ORTIZ, Widow of Lebrón, adult, homemaker, and resident of Humacao, Puerto Rico;

[signature]

MR. WILLIAM LEBRÓN COLÓN, of age, married, property owner and resident of Yabucoa, Puerto Rico;

AND MRS. JUANA LEBRÓN PEREZ, of age, married, homemaker, resident of Humacao, Puerto Rico.

I, the civil-law Notary, hereby certify that the ages, marital statuses, professions, and residences of the persons appearing are known to me from their declarations. I have ascertained that they are fully entitled to exercise their civil rights without having established anything to the contrary. Given that I consider that they have the necessary capacity to execute this deed, they freely make the following statements:

[stamp:] AGUEDO MOJICA  
MARRERO [:] CIVIL-LAW  
ATTORNEY [:] PUERTO  
RICO

ONE: Mr. Eladio Lebrón died intestate in Humacao, Puerto Rico on March eighteenth, nineteen hundred and fifty-five, and left the following assets which are subject to partition:

A. Joint ownership property worth half the value of the following property:

FOLIO SIXTY-FIVE

F. 65

“RURAL PROPERTY: Reinforced concrete house, zinc-roofed, single story, located on a plot of about a half-acre, belonging to Antonio Roig, Sucre, in the Rio Abajo District of the Humacao municipality, bounded to the north, i.e. its frontage, by the landlocking plot, and the island highway that runs from Humacao to its Beach, to the South and East by Antonio Roig Sucre; and to the West by Hector H. Gonzalez. To the left of this house runs a forest track belonging to Antonio Roig Sucre”.

[signature]

Eladio Lebron acquired this joint property from spouses Rafael Castaneda and Genoveva Figueroa, in accordance with the deed of sale number fifteen executed in Humacao, Puerto Rico, on April twelfth, nineteen hundred and forty-eight before civil-law notary Rafael A. Arroyo Rios in Humacao, Puerto Rico and is not recorded in the Land Register.

B. Benefit received by Eladio Lebrón from the United States Government's Veteran Administration for services rendered as a veteran, deposited by said Veterans Administration with the Clerk of the Honorable Superior Court of Puerto Rico, Humacao Vicinage, according to this Chamber's orders of April twenty-ninth, nineteen hundred and fifty-five and July tenth, nineteen hundred and fifty-five. TWO: On June twenty-fourth, nineteen hundred and fifty-five, in the Superior Court of Puerto Rico, Humacao Vicinage, in a decision in civil case number CS 55-413 in the matter of Declaration of Heirs, the Honorable Luis Pereyo, declared or established the following persons as sole and universal heirs of Eladio Lebrón:

[stamp:] AGUEDO MOJICA  
MARRERO [;] CIVIL-LAW  
ATTORNEY [;] PUERTO  
RICO

FOLIO SIXTY-SIX

F. 66

his lawful daughter Juana Lebrón Peres, his acknowledged son William Lebrón Colón, and his widow Saturnina Ortiz, all in accordance with the legislation in force at the time of this decedent's demise.

THREE: Given that the persons appearing have agreed as to the value, partition and adjudication of the property described above, in the first paragraph of this expositive section, they hereby undertake all the foregoing in accordance with the following clauses:

ONE: The parties agree as to the following values:

[signature]

(a) The joint ownership of half the property described in section A of the first section of this deed is assigned a value of SIX HUNDRED DOLLARS-----\$600.00

(b) The total funds deposited with the Clerk of the Superior Court, Humacao Vicinage, is THREE THOUSAND, NINE HUNDRED AND THIRTY-SEVEN DOLLARS AND SEVENTEEN CENTS-----  
---\$3,937.17

ALL THE FOREGOING produces a total for the Estate's assets of FOUR THOUSAND, FIVE HUNDRED AND THIRTY-SEVEN DOLLARS AND SEVENTEEN CENTS-----\$4,537.17

TWO: As of this date, the following obligations have been paid from the aforementioned assets:

[stamp:] AGUEDO MOJICA  
MARRERO [;] CIVIL-LAW  
ATTORNEY [;] PUERTO  
RICO

(A) SEVENTY-ONE DOLLARS AND EIGHTY-FOUR CENTS to Rafael Torrellas, for food items served to Eladio Lebrón up till the day of his demise-----\$71.84

(B) TWO HUNDRED AND FORTY-THREE DOLLARS to Justo Diaz for services concerning the preparation and interment of Eladio Lebrón's remains----\$243.00

THE FOREGOING produced a total for the



FOLIO SIXTY-SEVEN

F. 67

Estate's liabilities of THREE HUNDRED AND FOURTEEN DOLLARS  
AND EIGHTY-FOUR CENTS-----\$314.84

THREE: The net value of the assets resulting from the  
foregoing items is FOUR THOUSAND, TWO HUNDRED AND  
TWENTY-TWO DOLLARS AND THIRTY-THREE CENTS-----  
-----\$4,222.33

FOUR: Of this liquid remainder of FOUR THOUSAND, TWO  
HUNDRED AND TWENTY-TWO DOLLARS AND THIRTY-THREE  
CENTS, half of this amount, TWO THOUSAND, ONE HUNDRED AND  
ELEVEN DOLLARS AND SIXTEEN CENTS, is payable to Saturnina  
Ortiz, Widow of Lebrón, by way of community property-----\$2,111.16

[signature]

FIVE: The remaining half of the liquid value of the assets  
amounts to TWO THOUSAND, ONE HUNDRED AND ELEVEN  
DOLLARS AND SEVENTEEN CENTS, and belongs equally to the  
following persons appearing: Juana Lebrón Perez and William Lebrón  
Colón, and Juana Lebrón Perez's portion is the sum of ONE  
THOUSAND, FIFTY-FIVE DOLLARS AND FIFTY-NINE CENTS, and  
William Lebrón Colón's portion is the sum of ONE THOUSAND AND  
FIFTY-FIVE DOLLARS AND FIFTY-EIGHT CENTS.

[stamp:] AGUEDO MOJICA  
MARRERO [;] CIVIL-LAW  
ATTORNEY [;] PUERTO  
RICO

SIX: Saturnina Ortiz, Widow of Lebrón, and William Lebrón  
Colón hereby assign and transfer all their rights and actions over the  
property described in the first paragraph of the expositive portion of  
this deed to Juana Lebrón Perez at a value of SIX HUNDRED  
DOLLARS (\$600.00), thus supplementing the portion apportioned to  
said Juana Lebrón Perez according to the previous clause, with the  
sum of FOUR HUNDRED AND FIFTY-NINE DOLLARS AND FIFTY-  
NINE CENTS (\$459.59), to be paid from the funds deposited with the  
Clerk of the [...]

FOLIO SIXTY-NINE

F. 69

THUS stated before me, the Notary, and before the witnesses, who are of legal age, without legal prohibition to serve as such

FOLIO SIXTY-EIGHT

F. 68

of the Superior Court, Humacao Vicinage, all reaching a total of ONE THOUSAND AND FIFTY-FIVE DOLLARS AND FIFTY-NINE CENTS-----  
--\$1,055.59

SEVEN: Willian Lebrón Colón's portion amounts to ONE THOUSAND AND FIFTY-FIVE DOLLARS AND FIFTY-EIGHT CENTS and it shall be paid from the funds deposited with the Clerk of the Superior Court, Humacao Vicinage-----\$1,055.58

[signature]

EIGHT: The share of community property and the portions that are the subject of the foregoing clauses four, five, six and seven amount to FOUR THOUSAND, TWO HUNDRED AND TWENTY-TWO DOLLARS AND THIRTY-THREE CENTS, namely the liquid remainder of the estate-----  
-----\$4,222.33

FOUR: Juana Lebrón Perez shall assume the full and absolute ownership of the joint shared ownership of the property described in the foregoing first section of the expositive portion of this deed, without anything other than this deed being required. The parties hereby instruct the recording Notary to submit to the Humacao Superior Court the corresponding motion for the withdrawal of the funds held by the Clerk of said Court, in accordance with the terms of this deed and any other agreements in relation to their respective participations in these funds that the parties may freely agree following the execution of this deed.

[stamp:] AGUEDO  
MOJICA MARRERO  
[:] CIVIL-LAW  
ATTORNEY [:]  
PUERTO RICO

THESE are the provisions, agreements, and wishes of the parties, as well as the contracts perfected herein and, the recording Notary having given the relevant legal notices, this is the deed that the parties executed and formalized and which they are bound to observe and remain subject at all times to its consequent legal responsibilities.

IN THE PUERTO RICO SUPERIOR COURT  
HUMACAO DIVISION

United States of America  
The President of the USA  
Commonwealth of Puerto Rico

Saturnina Ortiz, Widow of Lebrón

Petitioner

Ex-parte

Civil Case No. CS-55-413

In the matter of:

Declaration of Heirs

DECISION

[illegible stamp]

WHEREAS: The petitioner in this case filed a duly sworn petition in this court alleging that she is an adult, a widow, and resident of Humacao, Puerto Rico, that she was married to Eladio Lebrón on May 1, 1943, and the said Eladio Lebrón died intestate on March 18, 1955 leaving an estate subject to partition.

WHEREAS: The petitioner alleges that Eladio Lebrón was previously married to Margarita Perez and was divorced from her on April 8, 1922, and this marriage produced a daughter named Juana Lebrón Perez, who was born on [REDACTED] 1920.

[stamp:] COMMONWEALTH OF PUERTO RICO [;]  
GENERAL COURT OF JUSTICE [;] [illegible]

WHEREAS: The petitioner alleges that Eladio Lebrón had a son named William Lebrón Colón, born of a relationship with Maria Colón Ortiz, and that said William Lebrón Ortiz was born on [REDACTED] 1923 and was acknowledged by his father, Eladio Lebrón.

WHEREAS: A hearing was scheduled in this matter, and witness testimony and documentary evidence was presented in support of the petitioner's requests, and the Court finds that the allegations the application have been proven.

THEREFORE: The Court grants the petition and declares that the sole and universal intestate heirs of Eladio Lebrón are his lawful daughter Juana Lebrón Perez, his acknowledged son William Lebrón Colón and his widow, the petitioner in this matter, Mrs. Saturnina Ortiz, Widow of Lebrón, and each shall receive the portion by way of usufruct determined by law, all in accordance with the statutory provisions in force at the time of said decedent's demise.

Entered in Humacao, Puerto Rico, today, June [handwritten:] 24<sup>th</sup>, 1955.

[tax stamp:] \$3 [;] 3 DOLLARS [illegible]

[signature]  
Luis Pereyó  
Superior Court Judge

[handwritten:] A0841947  
Volume 53 Folio 255

J.284—S. 45-50289—1954—50,000.  
Service and Supply Service—Printing Division

[stamp:] COMMONWEALTH OF PUERTO RICO  
Central Archive [;] Judiciary  
GENERAL COURT OF JUSTICE

[stamp:] PAID [;] 12918531  
[illegible]

PAID 1723329

1723329  
5¢ A 5¢

**CERTIFICATION**

I certify that this is a true and faithful copy of the original document as contained in the record, which I issue at the request of: [handwritten:] *Carlos Sánchez Lebrón*

☒ [X] WITH PRIOR PAYMENT OF FEES  
☐ [ ] FOR OFFICIAL USE, EXEMPT FROM FEES

REQUEST No. [handwritten:] 3965

Given in Hato Rey, Puerto Rico, today OCT 23 1997

[signature]

DOCUMENT ADMINISTRATION  
PROGRAM DIRECTOR

[handwritten:]  
12918531  
7000154  
3479041  
1723329



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### TRANSLATOR'S CERTIFICATE OF TRANSLATION

Translation from: Spanish (Puerto Rico) into English (US)

TARGEM Translations Inc.

I, Andreea I. Boscor, ATA-certified Spanish-English #525556, acting as translator at TARGEM Translations Inc., a NEW YORK City corporation, with its principal office at 185 Clymer Street, Brooklyn, NY, 11211, USA, certify that:

the English translated document is a true and accurate translation of the original Spanish and has been translated to the best of my knowledge.

Original Document Name: **Claim No. 173831 DN 21075**

Signed this 20<sup>TH</sup> of July 2022



Verify at [www.atanet.org/verify](http://www.atanet.org/verify)

A handwritten signature in blue ink, appearing to read "Andreea I. Boscor".

Andreea I. Boscor

